

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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DIGITAL MEDIA SOLUTIONS, LLC,	)	
	)	
Plaintiff,	)	CASE NO. 1:19-CV-00145
	)	
v.	)	Judge Dan Aaron Polster
	)	
SOUTH UNIVERSITY OF OHIO, LLC, <i>et al.</i> ,	)	Magistrate Judge
	)	Thomas M. Parker
Defendants.	)	

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**Motion of Illinois and Colorado Attorneys General to  
Modify December 5, 2019 Order to Delete Relief Against Them**

Illinois Attorney General Kwame Raoul and Colorado Attorney General Phil Weiser (the “Attorneys General”), by their counsel, respectfully move pursuant to Rule 59(e) of the Federal Rules of Civil Procedure, and in the alternative under Rules 60(b)(4) and 60(b)(6), for an order modifying the Court’s December 5, 2019 Order (the “Bar Order”) to delete its provisions granting injunctive and other relief against them, including, without limitation, the provision in paragraph 19 of the Bar Order that enjoins them from (1) enforcing against Studio Enterprise Manager, LLC and Arts Institutes International, LLC (collectively, the “Studio Group”) their respective States’ anti-fraud laws in connection with student loans that were assigned to the Studio Group before this action was filed, and payments on those loans that the Studio Group received after that assignment — none of which involves the property of the defendants in receivership in this case, South University of Ohio, LLC, *et al.*, and (2) exercising their rights under state court consent judgments they obtained against Education Management Corp.

By filing this motion, the Attorneys General do not concede, but instead expressly dispute, the Court’s personal jurisdiction over them and its subject matter jurisdiction to enter the relief

against them in the Bar Order. In support of this motion, the Attorneys General are submitting a separate memorandum of law.

Respectfully submitted,

KWAME RAOUL, Attorney General of Illinois;  
PHIL WEISER, Attorney General of Colorado

By: /s/ Richard S. Huszagh  
Richard S. Huszagh  
Illinois Assistant Attorney General  
100 W. Randolph St., 12th Floor  
Chicago, Illinois 60601  
*rhuszagh@atg.state.il.us*  
(312) 814-2587

Olivia D. Webster  
Colorado Sr. Assistant Attorney General  
Consumer Protection Section  
Colorado Attorney General's Office  
1300 Broadway  
Denver, CO 80203  
*Libby.Webster@coag.gov*  
(720) 508-6203

**Certificate of Filing and Service**

I hereby certify that on January 2, 2020, I electronically filed the foregoing Motion of Illinois and Colorado Attorneys General to Delete Relief Against with the Clerk of the Court for the United States District Court for the Northern District of Ohio, Eastern Division, by using the CM/ECF system, which will effect service on the other participants in the case.

/s/ Richard S. Huszagh